

**EPA Comment Number: 550-99**

Received: February 11, 2000

To: Homepage Oppts/DC/USEPA/US@EPA  
cc:

Subject: Docket number OPP-00550 -Support Letter-National Food Safety System

Please see attached letter of support.

If this was directed to the wrong agency or sent incorrectly, please reply or call (517) 887-4318. First time sending electronically!

Thanks.

- nfssdocket2.doc

Attachment:

February 10, 2000

U. S. Department of Agriculture  
Food Safety and Inspection Service  
Docket Number 98-045N

Department of Health and Human Services  
Centers for Disease Control and Prevention

Food and Drug Administration  
Docket Number 97N-0074

U.S. Environmental Protection Agency  
Docket Number OPP-00550B; FRL -6087-7

To whom it may concern,

The National Food Safety System (NFSS) Project is an outgrowth of an FDA facilitated meeting coined the "50 states meeting" that was held in September 1998 in Kansas City. This meeting brought together for the first time state, local, and federal food safety officials in an effort to better coordinate foodborne outbreak activities and develop proposals for better integrating food safety activities at all levels of government. Six working groups and a steering committee were formed and these groups continue to meet and make substantial progress in their activities. All NFSS members feel that their understanding of the national food safety system and the role different organizations and agencies play has been improved through this process. For the first time, state, local and federal officials have had an ongoing dialogue on improving coordination of services.

The state and local representatives of the NFSS steering committee have previously submitted docket comments outlining our initial thoughts on the federal strategic planning effort begun through the President's Council on Food Safety. Following the issuance of the January 7<sup>th</sup>, 2000 draft of the federal strategic plan, we now feel it

appropriate to submit further comments. Many of these comments were also made by state and local officials at the public meeting that was held on January 20<sup>th</sup> in Washington D.C.

The NFSS project has successfully initiated two projects that we feel have substantially contributed to national efforts to advance food safety goals. These two projects are:

1. Establishing a pilot program with 9 state food safety laboratories to coordinate the procedures and testing for E. coli O157:H7 in food specimens.
2. Establishing an information-sharing network called the Laboratory Exchange Network or LEXNET that allows these participating laboratories to exchange the food testing information with each other and potentially other partners.

In addition, two additional projects originating from our workgroups show substantial progress towards completion. These involve a comprehensive survey of state and local responsibilities towards food safety and a manual to guide multi-state outbreak coordination. This latter item we hope fills a needed gap in the management of multi-state outbreaks and may serve as a template for further discussion and policy development on this issue. We also hope it will receive the endorsement as an operational plan by the Foodborne Outbreak Response and Coordination Group (FORC-G). More detailed information on these program activities is available.

Having mentioned our successful efforts, the state and local representatives of the NFSS steering committee wish to make the following specific comments to the January 7<sup>th</sup> draft of the federal strategic plan.

1. We support the current framework of the federal strategic plan. We feel that the current organization of the strategic plan into three main goals, risk assessment, risk management and risk communication has adequately captured the breadth of activity. In addition, we wish to compliment the federal food agencies' efforts to adequately capture state and local input throughout the drafting of the strategic plan and through their continued involvement in NFSS.
2. We wish to see this strategic plan represent national planning towards food safety. Understanding the original intention of the President's executive order towards a unified federal budget for food safety, we do wish to re-emphasize the important role this strategic plan will have in focusing national efforts at the state, local and tribal level towards food safety. Specific mention of the word "national" in overarching goal statements would go along way to recognizing this interdependence.
3. Building on the success of state, local, tribal and federal communication begun through NFSS, we wish to encourage the addition of a specific action item under the risk communication objective establishing a permanent advisory committee to implement and assure the success of the activities begun under the strategic plan. This advisory committee should include members of local and state health and agricultural agencies having responsibility for food safety activities in their jurisdictions. There should also be an attempt to have this committee adequately represent different geographic regions of the country. We further recognize the importance of including consumer and industry members in an overarching advisory committee.

Once again, we appreciate the opportunity to provide comments and congratulate the federal agencies in their efforts toward a unified national strategic plan.

Sincerely,

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Medical Director

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Branch Chief

Doug Saunder  
Program Manager

Ingham County Health Dept  
Lansing, MI

Food and Drug Branch  
California Department  
Of Health Services

Office of Dairy & Foods  
Virginia Department of  
Agriculture/Consumer Serv.

On behalf of the following members of the NFSS Coordinating Committee:

Steve Bornmann, CO Dept. of Agriculture  
Jesse Greenblatt, NH Dept. of Health & Human Services  
Scott Holmes, Lincoln Lancaster County Health Dept.  
Joseph Corby, NY Dept. of Agriculture & Markets  
Jerry Gibson, SC Dept. of Health  
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